

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:15CV1036
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
v.)	
)	PLAINTIFF UNITED STATES OF
\$16,765.00 IN U.S. CURRENCY, ET AL.,)	AMERICA'S REQUEST TO ALLOW THE
)	STAY OF PROCEEDINGS TO EXPIRE
Defendants.)	AND TO SET A CASE MANAGEMENT
)	<u>CONFERENCE</u>

Now comes the Plaintiff, the United States of America, by and through its counsel, Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Phillip J. Tripi, Assistant United States Attorney, and provides this Honorable Court with notice that it does not intend to seek an extension of the current stay of proceedings past August 7, 2018. Specifically, although the criminal investigation remains active, the United States is prepared to sit down at a discovery planning meeting with claimants' counsel to explore what aspects of the civil discovery can proceed pending completion of the criminal investigation. As such, the United States requests that this Honorable Court issue a case management conference order which provides sufficient time for the United States to coordinate a planning meeting at which aspects of the civil litigation can be shared with all parties towards reaching an agreement as to how discovery could proceed at this point and what practical limits can be put into place by the Court

to permit the case to move forward in a meaningful way parallel to the completion of the criminal investigation.

Respectfully submitted,
JUSTIN E. HERDMAN
United States Attorney

By: /s/Phillip J. Tripi
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CERTIFICATE OF SERVICE

It is hereby certified that on this 3rd day of August, 2018, the foregoing pleading was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's system.

/s/Phillip J. Tripi
Phillip J. Tripi
Assistant United States Attorney